

### **REMARKS**

The Examiner objected to claims 2-5 as being dependent upon a rejected base claim, but indicated that claims 2-5 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In response, Applicants gratefully acknowledge the Examiner's indication of allowable subject matter.

The Examiner rejected claims 1, 6, and 7 under 35 U.S.C. §102(e) as allegedly being anticipated by Srivastava et al. U.S. Patent No. 6,061,676.

Applicant respectfully traverses the §102 rejections with the following arguments.

**35 U.S.C. §102**

The Examiner rejected claims 1, 6, and 7 under 35 U.S.C. §102(e) as being anticipated by Srivastava et al. U.S. Patent No. 6,061,676.

**Claim 1**

Applicant respectfully contends that Srivastava does not anticipate claim 1, because Srivastava does not teach each and every feature of claim 1.

As a first example of why Srivastava does not teach each and every feature of claim 1, Srivastava does not teach the feature: “recasting said expressions into a form of one or more token pairs arranged sequentially in a string, **each said token pair comprising an operator followed by an operand**” (emphasis added).

The Examiner argues the preceding feature of claim 1 in said first example is disclosed in Srivastava, col. 4, lines 51-54.

In response, Applicant respectfully notes that Srivastava, col. 4, lines 51-54 states: “FIG. 2 illustrates an embodiment of an optimization technique according to the principles of the invention. A complex SQL query 10 is broken down into blocks 21, which are then translated by a translation process 22 into relational algebraic expressions 23. ”

Applicant contends that the preceding quote from Srivastava does not disclose that the Srivastava’s blocks 21 are “in a form of one or more token pairs arranged sequentially in a string, each said token pair comprising an operator followed by an operand” as required by claim 1. Furthermore, the preceding quote from Srivastava does not disclose that the Srivastava’s

relational algebraic expressions 23 are “in a form of one or more token pairs arranged sequentially in a string, each said token pair comprising an operator followed by an operand” as required by claim 1. Therefore, Applicant maintains that Srivastava does not teach the preceding feature of claim 1 in said first example. Accordingly, Applicant maintains that claim 1 is in condition for allowance.

As a second example of why Srivastava does not teach each and every feature of claim 1, Srivastava does not teach the feature: “reducing said strings in accordance with a set of predetermined simplifying rules”.

The Examiner argues the preceding feature of claim 1 in said second example is disclosed in Srivastava, col. 4, lines 59-67.

In response, Applicant respectfully notes that Srivastava, col. 4, lines 59-67 states: “A set of equivalence rules consisting of the prior art equivalence rules 15 and **the equivalence rules of the present invention 25 is used to generate search space 26**. By considering not only blocks 21, but also the interrelationships among the blocks, in the relational algebraic expressions comprising search space 26, cost-based local and global optimizations are possible. Further, unlike the prior art technique of FIG. 1, search space 26 may be comprised of alternative implementations of the SQL query...” (emphasis added).

Applicant contends that the preceding quote from Srivastava indicates that the Srivastava’s equivalence rules 15 are used to generate a search space 26 of alternative implementations of the SQL query, and Srivastava does not indicate that the SQL query is reduced or otherwise modified by said equivalence rules as required by claim 1. Therefore,

Applicant maintains that Srivastava does not teach the preceding feature of claim 1 in said second example. Accordingly, Applicant maintains that claim 1 is in condition for allowance.

As a third example of why Srivastava does not teach each and every feature of claim 1, Srivastava does not teach the feature: “comparing the reduced strings by matching, to detect equivalence of the two algebraic expressions”.

The Examiner argues the preceding feature of claim 1 in said third example is disclosed in Srivastava, col. 3, lines 47-50.

In response, Applicant respectfully notes that Srivastava, col. 4, lines 42-49 states: “In particular, a collection of equivalence rules involving the theta-semijoin operator is used, in addition to equivalence rules known in the prior art, to **generate relational algebraic expressions that are equivalent to a SQL query**. These expressions may comprise a search space which is utilized by optimizing software or, alternatively, these expressions may be utilized by other types of software to, for example, determine the **equivalency of queries**” (emphasis added).

Applicant contends that the preceding feature of claim 1 is directed to detecting the “equivalence of the two algebraic expressions”. In contrast, the preceding quote from Srivastava discloses generation of “relational algebraic expressions that are equivalent to a SQL query” which does not disclose detecting the equivalence of the two algebraic expressions, as required by claim 1. Similarly, the preceding quote from Srivastava also discloses determining the equivalence of SQL queries, which does not disclose detecting the equivalence of the two algebraic expressions, as required by claim 1. Therefore, Applicant maintains that Srivastava

does not teach the preceding feature of claim 1 in said third example. Accordingly, Applicant maintains that claim 1 is in condition for allowance.

Based on the preceding arguments, Applicant respectfully maintains that Srivastava does not anticipate claim 1, and that claim 1 is in condition for allowance.

#### Claim 6

The Examiner states: "Claim 6 corresponds to claim 1 and is rejected for the reason set forth in the rejection of claim 1."

In response, Applicant respectfully contends that Applicant's arguments *supra* against the rejection of claim 1 are likewise applicable to the rejection of claim 6.

Accordingly, Applicant respectfully maintains that Srivastava does not anticipate claim 6, and that claim 6 is in condition for allowance.

#### Claim 7

The Examiner states: "Claim 7 corresponds to claim 1 and is rejected for the reason set forth in the rejection of claim 1."

In response, Applicant respectfully contends that Applicant's arguments *supra* against the rejection of claim 1 are likewise applicable to the rejection of claim 7.

Accordingly, Applicant respectfully maintains that Srivastava does not anticipate claim 7, and that claim 7 is in condition for allowance.

## CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0457.

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